

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

CHRIS TERRY,

Plaintiff,

-against-

CITY OF NEW YORK; FRANK RYAN; and  
JOHN/JANE DOES, Nos. 1–10 (Members of the New  
York City Department of Correction and New York  
City Health and Hospitals Corporation Correctional  
Health Services whose names are presently unknown  
to plaintiff),

Defendants.

**NOTICE OF MOTION**

23-CV-5955(NRM)(JRC)

**PLEASE TAKE NOTICE** that Defendants City of New York and Frank Ryan, by their attorney, the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, will move this Court before the Honorable Nina R. Morrison, United States District Judge, at the United States Courthouse for the Eastern District of New York at 225 Cadman Plaza East, Brooklyn, New York 11201, on a return date to be set by the Court, for a decision and order dismissing the Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and such other and further relief as the Court deems proper.

**PLEASE TAKE FURTHER NOTICE**, that by Order of the Court on March 11, 2024, Plaintiff's opposition must be served on Defendants on or before May 3, 2024; and Defendants' reply papers, if any, must be served on or before May 17, 2024.

Dated: New York, New York  
April 5, 2023

**HON. SYLVIA O. HINDS-RADIX**  
CORPORATION COUNSEL OF THE CITY OF NEW YORK  
*Attorney for Defendants City of New York and Ryan*  
100 Church Street  
New York, New York 10007  
(212) 356-2336

By:



Thomas Lai  
*Senior Counsel*  
Special Federal Litigation Division

cc: Robert T. Perry, Esq. (**via First Class Mail**)  
509 12th Street  
Ste #2c 11215  
Brooklyn, NY 11201  
[rtperry32@gmail.com](mailto:rtperry32@gmail.com)  
*Attorney for Plaintiff*